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Attorney for Plaintiff,
DAVID KLEIN

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DAVID KLEIN,) Case No.: CV-24-cv-03265 WHO
vs. Plaintiff,)
vs.)
FARVA JAFRI, JAFRI LAW FIRM, MYKOLA)
ISHCHUK, ESMERALDA FAMUTIMI and)
DOES 1-20.)
Defendants.)
) **STIPULATION AND PROPOSED ORDER**
) **EXTENDING HEARING DATE,**
) **OPPOSITION AND REPLY DUE DATE**
) **ON DEFENDANTS' MOTION TO**
) **DISMISS AND MOTION TO STRIKE**

IT IS HEREBY STIPULATED BETWEEN Plaintiff DAVID KLEIN (hereafter "KLEIN" or "Plaintiff") and Defendants FARVA JAFRI, (hereafter "JAFRI") and MYKOLA ISHCHUK (hereafter "ISHCHUK") (hereafter jointly "Defendants") that the hearing date on Defendants' Motion to Dismiss and Motion to Strike ("Motions"), currently set for January 8, 2025 at 2:00 pm., the opposition to the Motions, currently due December 4, 2024, and the reply in support of the Motions, currently due December 11, 2024, be extended as follows:

The hearing date on the motion will be February 19, 2025 or as soon thereafter as is convenient with the court. The opposition to the Motions will be due January 22, 2025. And the reply in support of the Motions will be due on January 31, 2025.

The parties apologize to the court for the delay in finalizing the settlement agreement (this is the third extension requested by the parties). However, the parties are working diligently toward resolution and the delay is due to the fact that the settlement involves two actions in two different states where defendants are represented by two different sets of attorneys. No further extensions are anticipated.

Dated: December 2, 2024

IT IS SO STIPULATED AND AGREED

/s/ Inna Nytochka
PETER CATALANOTTI
INNA NYTOCHKA
WILSON ELSER MOSKOWITZ
EDELMAN& DICKER
Attorneys for Defendants, FARVA JAFRI,
MYKOŁA ISHCHUK and ESMERALDA
FAMUTIMI

CARLOS JATO
Attorney for Plaintiff
DAVID KLEIN

1 **{PROPOSED} ORDER:**

2 Pursuant to the stipulation of the parties, the requests for an extension on the deadlines
3 pertaining to the pending Motion to Dismiss and Motion to Strike is hereby granted as follows: the
4 Hearing date shall be February 19, 2025, at 2:00 pm, any opposition shall be filed by January 22,
5 2025, and any reply shall be filed by January 31, 2025. **This is the last continuance that the**
6 **Court expects to grant.**

7 IT IS SO ORDERED:

8 DATED: December 4, 2024



9 HON. WILLIAM H. ORRICK
10 US DISTRICT JUDGE

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